REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested.

Currently, claims 9 and 14 are pending in this application.

The present application includes appropriate section headings. Applicant notes

that the section headings indicated in MPEP §608.01 are merely suggested guidelines.

Rejection Under 35 U.S.C. §112, Second Paragraph:

Claims 9-10 and 14-15 were rejected under 35 U.S.C. §112, second paragraph, as

allegedly being indefinite. Claim 9 has been amended to require "wherein the platform is

a program for <u>acquiring</u> an output." Claim 9 has also been editorially amended to require

"wherein the coupling processing program has a command code for making the computer

execute processing to acquire the data...and to convert the data...so that the data is

adapted...." It is thus clear that execution of the coupling program relates to acquiring

and converting data and that it is the data which is adapted. Applicant submits that still

pending claims 9 and 14 are in full conformance with 35 U.S.C. §112, second paragraph

and respectfully requests that this rejection be withdrawn.

Rejection Under 35 U.S.C. §102:

Claims 9-10 and 14-15 were rejected under 35 U.S.C. §102(b) as allegedly being

anticipated by Sakai et al (U.S. '249, hereinafter "Sakai"). Applicant respectfully

traverses this rejection with respect to still pending claims 9 and 14.

For a reference to anticipate a claim, each element must be found, either expressly

or under principles of inherency, in the reference. Each element of the claimed invention

is not found in Sakai. For example, Sakai fails to teach or suggest "wherein execution of the application program provides the generated data of the output object to a storage memory dedicated to the application program, and wherein execution of the coupling program automatically acquires the generated data from the storage memory," as required by independent claim 9. Similar comments apply to independent claim 14.

Through the above-noted claim feature, the processing using the application program only has to generate data (such as driving amount and driving timing) and store this data to a storage memory dedicated to the application program. This is supported by, for example, page 11, lines 9-14 of the originally-filed specification stating "In accordance with such a construction, the data of an arithmetic result (e.g., driving amount and driving timing) are automatically acquired by the processing using the coupling processing program only by simply calculating these data and storing these data to the memory means in the application." (Refer also to Figs. 9A-10 and corresponding written text). The programming work required for the application program is therefore greatly simplified since the application program may be developed without consideration of (i.e., independently of) the timing for providing data. A developer of the application program has a lighter burden because he/she does not need to develop the application in consideration of other programs such as a coupling processing program and a platform program.

Sakai discloses a program which is divided into three parts: an application unit 100, a communication conversion unit 200 and a driver unit 300. The Office Action

apparently alleges that the communication conversion unit 200 corresponds to the claimed coupling program.

As shown in Fig. 3, the communication conversion unit 200 includes a common memory 210. As illustrated in Fig. 6 and described in corresponding written text in col. 10, application software 120 of the application unit 100 in step [1] writes data to common memory 210 in the communication conversion unit 200. A developer of the application program therefore must consider the processing of the middle program (i.e., the communication conversion unit 200) such as the appropriate timing for writing data into the common memory 210. In contrast, processing using the application program in the present invention only has to generate the data and store it in a storage memory dedicated to the application program (a storage memory which is outside of the coupling program). Processing of the coupling program then automatically acquires this data from the storage memory dedicated to the application program. In Sakai, the communication conversion unit 200 does not automatically acquire the data stored in a storage memory specifically dedicated to the application program since data is written by the execution of the application unit 100 to the common memory 210 of the communication conversion unit 200. Since the application unit 100 writes data into the common memory 210 of the communication conversion unit 200, the developer of the application unit 100 needs to consider the communication conversion unit 200 when developing the application unit program. The burden on the software developer of the application unit program 100 in Sakai's system is therefore increased with respect to the present invention.

Accordingly, Applicant submits that still pending claims 9 and 14 are not anticipated by Sakai and respectfully requests that the rejection of these claims under 35 U.S.C. §102 be withdrawn.
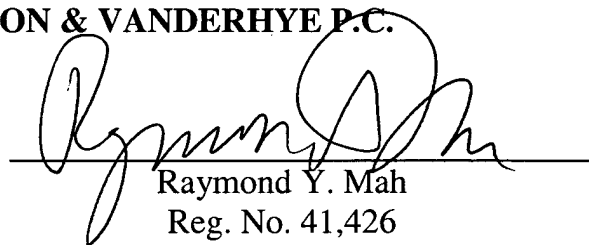
Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: _____
Raymond Y. Mah
Reg. No. 41,426

RYM:sl
901 North Glebe Road, 11th Floor
Arlington, VA 22203
Telephone: (703) 816-4000
Facsimile: (703) 816-4100